UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

TIMOTHY EDWARDS, Plaintiff,

CASE NO.

VS.

Judge Magistrate Judge

EQUIFAX INFORMATION
SERVICES, LLC, a foreign limited liability company; TRANS UNION, LLC, a foreign limited liability company; and CAINE & WEINER COMPANY, INC., a foreign profit corporation;

Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the 41A District Court, Macomb County, Michigan, to the United States District Court for the Eastern District of Michigan, on the following grounds:

1. Plaintiff Timothy Edwards ("Plaintiff") served Trans Union on or about September 15, 2017, with a Summons and Complaint filed in the 41A District Court, Macomb County, Michigan. Copies of the Summons and Complaint, as received, are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

- 2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 17-18 and 46-60.
- 3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.
- 4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 41A District Court, Macomb County, Michigan, to the United States District Court for the Eastern District of Michigan.
- 5. Counsel for Trans Union has confirmed with the 41A District Court, Macomb County, Michigan, by telephone, that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.
- 6. Notice of this removal will promptly be filed with 41A District Court, Macomb County, Michigan and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 41A District Court, Macomb County, Michigan to the United States District Court, Eastern District of Michigan.

Respectfully submitted,

s/ William M. Huse

Laura K. Rang, Esq. (IN #26238-49-A) William M. Huse, Esq. (IN #31622-49) Schuckit & Associates, P.C. 4545 Northwestern Drive Zionsville, IN 46077

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Counsel for Trans Union, LLC

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

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CERTIFICATE OF SERVICE

I, William M. Huse, hereby certify that on the 20th day of September, 2017, I electronically filed the foregoing with the Clerk of the Court using the ECF systems which will automatically send notification of such filing to the following counsel of record:

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None.	

I further certify that on the 20th day of September, 2017, a copy of the foregoing was sent via U.S., First Class Mail, postage prepaid to the following non-ECF participants:

Gary D. Nitzkin, Esq. Travis Shackelford, Esq.

for Plaintiff Timothy Edwards

Carl Schwartz, Esq.

Credit Repair Lawyers of America

22142 West Nine Mile Road

Southfield, MI 48033

Respectfully submitted,

s/ William M. Huse

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